

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

REBECCA BYBEE,	:	Case No. C-1-01-623
	:	
Plaintiff,	:	Judge Weber
	:	
vs.	:	Magistrate Judge Hogan
	:	
THE PROCTER & GAMBLE	:	
COMPANY, et al.,	:	AFFIDAVIT OF
	:	REBECCA LAWRENCE, ESQ.
Defendants.	:	
	:	

County of Hamilton)
) ss:
State of Ohio)

Rebecca Lawrence, Esq., being duly sworn and cautioned, for her Affidavit in support of Defendants' Sur-Reply in Opposition to Plaintiff's Motion to Compel, states as follows:

1. My name is Rebecca Lawrence, and I am Legal Counsel for Defendants in the above-captioned matter. At all times relevant to Rebecca Bybee's claims in this case I acted as legal counsel to The Procter & Gamble Health Care Plan (hereinafter, "the Plan"). I make this Affidavit on my own personal knowledge and am competent to testify as to all matters set forth herein.

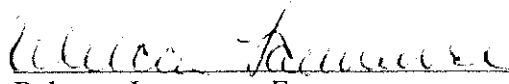
2. As legal counsel for the Plan, I reviewed the Administrative Record pertaining to Plaintiff's denial of benefits claim for completeness prior to its transmittal to outside counsel for the Plan. It is my understanding that the Administrative Record, in its entirety, was thereafter forwarded to Plaintiff's counsel in this case. It was upon these documents, now compiled as the Administrative Record, that the Plan made its decision as to Plaintiff's benefits claim.

3. No additional evidence was available to or considered by the Plan Administrator at the time Plaintiff's benefits determination was made. The Administrative Record contains every document and piece of information that was considered by the Plan Administrator in reaching the decision to deny Plaintiff's benefits claim.

4. I had an opportunity to revisit the Plan's denial of benefits to Plaintiff, at the request of her attorney, Carl Grayson, back in April-May 2001. In responding to Mr. Grayson's inquiry, I reviewed only those documents that were available to the Plan Administrator when Plaintiff's benefits determination was made. Thereafter, after this lawsuit was filed, true and accurate copies of each of those documents were sent to defense counsel.

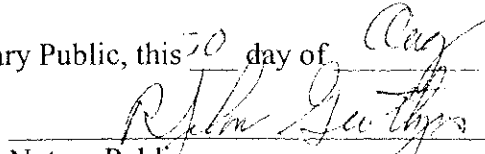
5. No other documents or evidence pertaining to Plaintiff's benefits claim are known to Defendants.

FURTHER AFFIANT SAYETH NAUGHT.


Rebecca Lawrence, Esq.

County of Hamilton)
) ss:
State of Ohio)

Sworn to and subscribed before me, a Notary Public, this 30 day of Aug, 2002.


Notary Public

R. JOHN GROTHJAN
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 08-02-04